

Exhibit A



Notice of Service of Process

null / ALL
Transmittal Number: 29713417
Date Processed: 08/18/2024

Primary Contact: Tracy Adair
AMERICAN AIRLINES, INC.
1 Skyview Dr
Md 8B503
Fort Worth, TX 76155-1801

Entity:	American Airlines, Inc. Entity ID Number 4333094
Entity Served:	American Airlines, Inc.
Title of Action:	Gina Mason vs. American Airlines, Inc.
Matter Name/ID:	Gina Mason vs. American Airlines, Inc. (15306532)
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Wayne County Circuit Court, MI
Case/Reference No:	24-011602-NO
Jurisdiction Served:	Michigan
Date Served on CSC:	08/16/2024
Answer or Appearance Due:	28 Days
Originally Served On:	CSC
How Served:	Certified Mail
Sender Information:	Lee Steinberg Law Firm, P.C. 800-533-3733

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

251 Little Falls Drive, Wilmington, Delaware 19808-1674 (888) 690-2882 | sop@cscglobal.com

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Eric S. Steinberg
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Personal Injury Lawyers

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Offices: Flint, Saginaw,
Grand Rapids, and Southfield
www.1800leefree.com

Brian M. Bez, Of Counsel **

* Also admitted to Texas and Wisconsin

** Also admitted to Florida

August 13, 2024

American Airlines, Inc.
CSC-Lawyers Incorporating Service (Company)
3410 Belle Chase Way, Suite 600
Lansing, MI 48911

VIA CERTIFIED MAIL/RETURN RECEIPT REQUESTED 70222410000336023801

RE: Gina Mason v American Airlines, Inc.
Case No.: 24-011602-NO

Dear Sir/Madam:

Enclosed herein for **service**, please find the Summons , Complaint and Jury Demand filed against American Airlines, Inc., in Wayne County Circuit Court.

The enclosed documents should be turned over to your insurance carrier immediately. If you were not insured on the date of the incident, please contact my office immediately.

Very truly yours,

LEE STEINBERG LAW FIRM, P.C.

/s/ Rebecca H. Filiatraut

REBECCA H. FILIATRAUT

RHF/mjs
Enclosures

Original - Court
1st Copy - Defendant2nd Copy - Plaintiff
3rd Copy - ReturnSTATE OF MICHIGAN
THIRD JUDICIAL CIRCUIT
WAYNE COUNTY

SUMMONS

CASE NO.
24-011602-NO
Hon. Charlene M. Elder

Court telephone no.: 313-224-5436

Plaintiff's name(s), address(es), and telephone no(s)
Mason, Gina

v

Defendant's name(s), address(es), and telephone no(s).
American Airlines, Inc.Plaintiff's attorney, bar no., address, and telephone no
Rebecca H. Filiatraut 46443
29777 Telegraph Rd Ste 1555
Southfield, MI 48034-7662**Instructions:** Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.**Domestic Relations Case**

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in ☐ this court, ☐ _____ Court, where it was given case number _____ and assigned to Judge _____.
- The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party **or take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date
8/12/2024Expiration date*
11/11/2024Court clerk
Samiah Rahnuma

Cathy M. Garrett- Wayne County Clerk.

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

MC 01 (3/23)

SUMMONS

MCR 1.109(D), MCR 2.102(B), MCR 2.103, MCR 2.104, MCR 2.105



SUMMONSCase No. : **24-011602-NO****PROOF OF SERVICE**

TO PROCESS SERVER: You must serve the summons and complaint and file proof of service with the court clerk before the expiration date on the summons. If you are unable to complete service you must return this original and all copies to the court clerk.

CERTIFICATE OF SERVICE / NONSERVICE

☐ I served ☐ personally ☐ by registered or certified mail, return receipt requested, and delivery restricted to the addressee (copy of return receipt attached) a copy of the summons and the complaint, together with the attachments listed below, on:

☐ I have attempted to serve a copy of the summons and complaint, together with the attachments listed below, and have been unable to complete service on:

Name	Date and time of service
Place or address of service	
Attachments (if any)	

☐ I am a sheriff, deputy sheriff, bailiff, appointed court officer or attorney for a party.

☐ I am a legally competent adult who is not a party or an officer of a corporate party. I declare under the penalties of perjury that this certificate of service has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

Service fee \$	Miles traveled \$	Fee \$	
Incorrect address fee \$	Miles traveled \$	Fee \$	Total fee \$

Signature

Name (type or print)

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of the summons and complaint, together with

Attachments (if any) _____ on _____ Date and time

_____ on behalf of _____

Signature

24-011602-NO FILED IN MY OFFICE Cathy M. Garrett WAYNE COUNTY CLERK 8/12/2024 10:26 AM Samiah Rahnuma

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

GINA MASON,

Plaintiff,

v

Case No. 24-
Honorable:

-NO

AMERICAN AIRLINES, INC.

Defendant.

LEE STEINBERG LAW FIRM, P.C.
REBECCA H. FILIATRAUT P46443
Attorney for Plaintiff
29777 Telegraph Road, Suite 1555
Southfield, Michigan 48034
248-352-7777; Fax 248-352-6254
rebecca@leefree.net / mandy@leefree.net

COMPLAINT

There is no other civil action between these parties arising out of the same transaction or occurrence as alleged in this complaint pending in this court, nor has any such action been previously filed and dismissed or transferred after having been assigned to a judge, nor do I know of any other civil action, not between these parties, arising out of the same transaction or occurrence as alleged in this complaint that is either pending or was previously filed and dismissed, transferred, or otherwise disposed of after having been assigned to a judge in this court.

NOW COMES the Plaintiff, GINA MASON, by and through her attorneys, LEE STEINBERG LAW FIRM, P.C., by REBECCA H. FILIATRAUT, and for her Complaint against the Defendant, AMERICAN AIRLINES, INC., states as follows:

PARTIES AND VENUE

1. That Plaintiff, GINA MASON, was at all times relevant hereto, a resident of the City of Saginaw, County of Saginaw, State of Michigan.
2. That Defendant, AMERICAN AIRLINES, INC., is a foreign profit corporation doing business in the City of Romulus, County of Wayne, State of Michigan.

3. That the complained of events occurred in the County of Wayne, State of Michigan.

4. That the amount in controversy exceeds TWENTY-FIVE THOUSAND DOLLARS (\$25,000.00), exclusive of costs, interests and attorney fees, and is otherwise within the jurisdiction of this Court.

COMMON FACTUAL ALLEGATIONS

5. Plaintiff reaffirms and realleges each and every allegation contained in the above paragraphs as if fully set forth herein.

6. That on or about February 11, 2024, Plaintiff, GINA MASON, was a business invitee of Defendant AMERICAN AIRLINES, INC., and was a restrained passenger seated in seat 29D, on flight #378 from Baltimore, Maryland to Detroit Metro Airport in the City of Romulus, County of Wayne, State of Michigan.

7. That on the aforementioned date, Plaintiff, GINA MASON, was restrained in her seat during the flight. The flight attendants were serving beverages and snacks when the captain instructed everyone to take their seats and buckle up due to turbulence. A flight attendant parked the service cart next to Plaintiff's seat, locked the wheels and left the cart unattended while they proceeded to sit down. During the turbulence, the beverage cart was shaking which resulted in the hot coffee pot that was left on top of the cart to fall off into Plaintiff's lap, causing her to sustain severe 1st and 2nd degree burns over her legs, thighs, and genital area.

COUNT I- NEGLIGENCE OF AMERICAN AIRLINES, INC.

8. Plaintiff reaffirms and realleges each and every allegation contained in the above paragraphs as if fully set forth herein.

9. Defendant, AMERICAN AIRLINES, INC., had a duty to use due care and caution in securing their beverage carts during the flight and breached said duty in the following ways:

- a. negligently failing to remove or secure the hot coffee pot on the beverage cart during extreme turbulence; and
- b. negligently leaving the beverage cart parked directly next to a passenger's seat during extreme turbulence.

10. That as a direct and proximate result of Defendant, AMERICAN AIRLINES INC.'s negligence in failing to use due care and caution in securing the hot coffee pot and beverage cart, Plaintiff, GINA MASON, sustained the following injuries:

- 1st and 2nd degree burns to her bilateral legs, thighs and her genital area; and
- Anxiety and depression.

11. In addition, Plaintiff, GINA MASON, suffered physical pain and suffering, physical disability, incapacity, denial of everyday social pleasures and enjoyments, diminished quality of life, scarring and disfigurement, mental anguish, emotional distress, fright and shock, embarrassment and humiliation and economic loss damages for medical expenses.

12. That if it is discovered that the minor Plaintiff was suffering from any other medical condition prior to this incident, then and in that event, the minor Plaintiff claims that those injuries and damages were precipitated, aggravated and/or accelerated by these injuries set forth herein.

14. That as a further direct and proximate result of the negligence of the Defendant the Plaintiff has in the past incurred bills for doctors and related medical treatment.

WHEREFORE, Plaintiff, GINA MASON, prays this Court grant judgment in her favor and against Defendant, AMERICAN AIRLINES, INC., in an amount in excess of \$25,000.00, exclusive of costs, interest, and attorney fees. Plaintiff further requests for such other and further relief as this Honorable Court shall deem to be just and equitable.

Respectfully Submitted,

LEE STEINBERG LAW FIRM, P.C.

/s/Rebecca H. Filiatraut
REBECCA H. FILIATRAUT (P46443)
Attorney for Plaintiff
29777 Telegraph Road, Suite 1555
Southfield, MI 48034
(248) 352-7777/Fax: (248) 352-6254

Dated: August 12, 2024

24-011602-NO FILED IN MY OFFICE Cathy M. Garrett WAYNE COUNTY CLERK 8/12/2024 10:26 AM Samiah Rahnuma

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

GINA MASON,

Plaintiff,

v

Case No. 24-
Honorable:

-NO

AMERICAN AIRLINES, INC.

Defendant.

LEE STEINBERG LAW FIRM, P.C.
REBECCA H. FILIATRAUT P46443
Attorney for Plaintiff
29777 Telegraph Road, Suite 1555
Southfield, Michigan 48034
248-352-7777; Fax 248-352-6254
rebecca@leefree.net / mandy@leefree.net

DEMAND FOR TRIAL BY JURY

NOW COMES Plaintiff, GINA MASON, by and through counsel, LEE STEINBERG LAW FIRM, P.C., by REBECCA H. FILIATRAUT, and hereby demands a trial by jury in this matter pursuant to MCR 2.508(B).

Respectfully submitted,

LEE STEINBERG LAW FIRM, P.C.

/s/ Rebecca H. Filiatraut

REBECCA H. FILIATRAUT (P46443)
Attorneys for Plaintiff
29777 Telegraph Road, Suite 1555
Southfield, Michigan 48034

Date: August 12, 2024

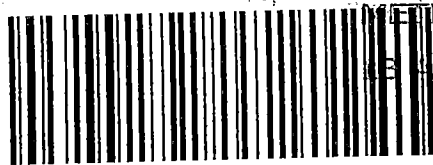
CERTIFIED MAIL

LEE STEINBERG LAW FIRM PC

1-800-LEE-FREE

29777 TELEGRAPH RD., STE 1555

SOUTHFIELD, MI 48034

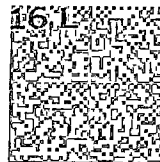


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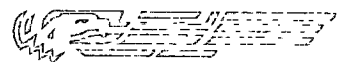
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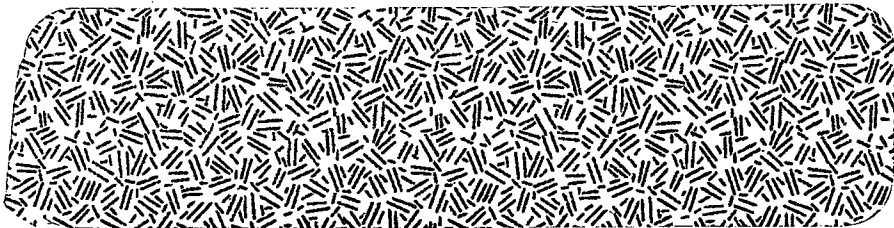
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